

EXHIBIT

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1 A. Yes, ma'am. It was the living room, yes, ma'am.

2 Q. Okay. It was another room?

3 A. No, it was in the living room.

4 Q. Oh, the living room?

5 A. Yes, ma'am.

6 Q. Okay. But you don't know of anything specific
7 that --

8 A. No, ma'am.

9 Q. -- was rude about the interaction?

10 A. No, ma'am. No, ma'am.

11 MS. POOLE: Okay. I think that is all the
12 questions that I have.

13

14 EXAMINATION

15 BY MS. PETTY:

16 Q. Hi, J.I.

17 A. How are you doing?

18 Q. I'm Amy Petty.

19 Besides 2K, what were the other video games that
20 you like to play.

21 A. Fortnite and Madden.

22 Q. Fortnite and Madden?

23 A. Yes, ma'am.

24 Q. Madden is football --

25 A. Yes, ma'am.

1 Q. -- is that correct? Okay.

2 What about Juwan, what other games did he like to
3 play besides Call of Duty?

4 A. 2K and Madden, that's it.

5 Q. That's it. Just those. Okay.

6 And what's the significance of your tattoos on
7 your left arm?

8 A. This one?

9 Q. Sure. The one on your upper arm, tell me about
10 that one first.

11 A. Oh, it's says love your enemies, do good to those
12 who crush you, bless those who -- no, it says do good to
13 those who hate you, bless those who crush you, and pray for
14 those who mistreat you.

15 Q. And why did you decide on that, those particular
16 words?

17 A. I was always getting treated bad from other
18 people. So it was like I used to always -- I never prayed
19 on another person's downfall because it was never, that's
20 not how it was.

21 So it was just like they ain't never liked me but
22 I mean I always wanted success for another person. So
23 you're a living human being, so I'm not going to hate on
24 you. You got a life. I got a life. There's no point in
25 hating.

1 So I mean you, I'm not going to mistreat you. So
2 just, I'm going to just pray for you.

3 Q. Okay. And how long ago did you get that
4 particular tattoo?

5 A. I would say like a month ago.

6 Q. Okay. And then how about the tattoo down on your
7 lower forearm?

8 A. It says loyalty out values everything. And it
9 means like a lot of people could say they got love for you
10 and like they will always have your back.

11 But love could really mean two different words.

12 Love can mean, you can love a person but really
13 let any person talk behind your back.

14 And loyalty means you will always stand behind
15 that person's back. Even when they doing wrong, you always
16 make sure they like, they always, you always make sure they
17 know what they're doing.

18 Q. And did you get that at the same time?

19 A. I got this on my birthday.

20 Q. When?

21 A. August 11th.

22 Q. Of this year?

23 A. Yes, yes, ma'am.

24 Q. Do you have any other --

25 A. This one, this says brothers keepers.

1 And it basically means I always, me and my
2 brother Juwan and my other brother, we always have each
3 other's back, even when each other's wrong. So I always
4 have each other, brothers keepers.

5 Q. And when did you get that tattoo on your right
6 arm?

7 A. Same time I got this one.

8 Q. On your birthday?

9 A. Yes, ma'am.

10 Q. Do you have any other ones?

11 A. Well -- yes, ma'am.

12 Q. You don't -- you can just describe it --

13 A. Oh.

14 Q. -- and maybe where it is would be -- up on your
15 right, your right --

16 A. My right shoulder.

17 Q. -- shoulder, upper chest?

18 A. It's a heart, me and my mother got it for,
19 symbolizing as love is always, love is always going to be
20 in the air. But there's going to be some hard times
21 between love. So you just got to find a way how to find
22 that connection back again.

23 Q. And when did you get that tattoo on your upper
24 right chest?

25 A. I think like September 21st of this year.

1 Q. Do you have any other --

2 A. No, ma'am.

3 Q. -- tattoos you want to tell me -- okay.

4 Now switching gears a little bit -- when you spoke
5 to Dr. Etheridge --

6 A. Yes, ma'am.

7 Q. -- was your mother with you the entire time you
8 spoke with her?

9 A. She was with me for like, she was with me while
10 Dr. Etheridge was introducing herself.

11 And she was asking me questions when my mom --
12 then that's when my mom, that's when my mom stepped out.
13 And she, Dr. Etheridge heard her saying she was stepping
14 out.

15 So it was just like, I would say my mom was in
16 the car for like 10 seconds max.

17 Q. I just want to make sure I understand you
18 correctly.

19 So you all were first, when you first started
20 talking to Dr. Etheridge, you were actually in the car --

21 A. Yes, ma'am.

22 Q. -- with your mother?

23 A. Yes, ma'am.

24 Q. And then I think earlier you had testified about
25 y'all did introductions at that time.

1 And then am I right that the cell service was
2 going out?

3 A. Yes, ma'am.

4 Q. So you all returned back home --

5 A. Yes, ma'am.

6 Q. -- is that correct?

7 And then did you call Dr. Etheridge back once you
8 got home?

9 A. Yes, ma'am. Yes, ma'am.

10 Q. Okay. And at that point, when you had gotten
11 back home, was your mother on the phone with you then?

12 A. No, ma'am. She got out of the car.

13 Q. Okay. So when you spoke with Dr. Etheridge once
14 you had gotten home, it was just you and Dr. Etheridge --

15 A. Yes, ma'am.

16 Q. -- speaking?

17 A. Yes, ma'am.

18 Q. Okay. Thank you.

19 When you lived on Burgundy Street, did you feel
20 safe in the neighborhood there?

21 A. No, ma'am.

22 Q. Tell me why please.

23 A. I mean it's, it's really not like a safe
24 neighborhood. You'll always hear about it on the news. So
25 it was like you can't feel safe in that neighborhood.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:22-CV-00068-BO

YOLANDA IRVING, et al.,)

Plaintiffs,)

V.)

THE CITY OF RALEIGH, et)

al.,)

Defendants.)

VIDEOTAPED DEPOSITION
OF
Z.G.

NOVEMBER 18, 2022
2:47 P.M. - 6:01 P.M.

TIN FULTON WALKER & OWEN
407 North Person Street
Raleigh, North Carolina

Reported by: Michelle Maar, RDR, RMR, FCRR

1 A. Different kinds, whatever, whatever like,
2 whatever house they want to build, that's what we build.

3 Q. So what kind of work do you do as you're building
4 houses?

5 A. What kind of work am I doing now?

6 Q. Right.

7 A. When I go, going to go get wood. If the group
8 need a hand, I'll give it to them.

9 Q. Have you had any training on carpentry skills?

10 A. No.

11 Q. So why did your family live in the Raleigh North
12 Apartments in Burgundy Street?

13 A. We had nowhere else to go, fix our budget.

14 Q. Who got that apartment?

15 A. My grandfather.

16 Q. Did he live with you all when you first moved in?

17 A. No.

18 Q. How did your grandfather find that location for
19 you?

20 A. I don't know. I was a baby, couple months.

21 Q. So why did your family move? Was it the stabbing
22 and the eviction?

23 MR. DAVIS: Objection, asked and answered.

24 THE WITNESS: Yes.

25 /////

1 BY MS. KIBLER:

2 Q. Was there any other reason why your family moved
3 out of Burgundy Street?

4 A. Any other reason?

5 Q. Yes, sir.

6 A. I mean my mom, she'll say something like the
7 activity that be going on over there and stuff. She didn't
8 like it. She likes where she stays now, it's Cary,
9 suburban.

10 Q. Do you remember any time before May 2022 [sic]
11 when you were scared by what you saw on Burgundy Street?

12 A. Before 2022?

13 Q. Yes, sir.

14 A. Not really. I mean I'd been in that neighborhood
15 since I was a baby. So it's like all that stuff is like --
16 I don't know. I can't say.

17 Well, I was used to hearing about it, being like,
18 it being in my ear. But actually into something, I wasn't
19 doing that. Like I was just always outside with the kids
20 or I'm in the house playing a game.

21 Q. Do you remember seeing people who you knew were
22 wearing colors?

23 A. Colors?

24 Q. Gang colors?

25 MR. DAVIS: Objection, form.

1 THE WITNESS: No.

2 BY MS. KIBLER:

3 Q. Do you remember anybody being involved in gang
4 activity who lived on Burgundy Street?

5 A. Of course.

6 Q. You say of course?

7 A. Yes.

8 Q. What gang, what gang sects or what gangs lived on
9 Burgundy Street, like Bloods, Crips?

10 A. Yeah.

11 Q. Both Bloods and Crips?

12 Tell me the things that the members of the Bloods
13 gang would do on Burgundy Street.

14 A. They were like regular old people, they just be
15 chilling.

16 Q. Do you know if any of the gang members sold drugs
17 from their homes at Burgundy?

18 A. I know they did.

19 Q. How many gang members do you think lived in the
20 Raleigh North Apartments?

21 A. It's all over. That's what Raleigh North is
22 known for.

23 Q. Did it make you fearful that there were gang
24 members selling drugs in Raleigh North?

25 A. No. That was them and their business. It didn't

1 have nothing to do with me.

2 Q. Were you, were you there at Raleigh North when
3 there were shootings into any of the buildings at Raleigh
4 North?

5 A. Yes.

6 Q. Did that make you fearful?

7 A. Yeah -- because it could have been me. Some old
8 lady almost, the bullet almost hit her head.

9 Q. So did you see Raleigh Police Department officers
10 patrolling the Raleigh North area?

11 A. All the time they will be nosey, coming down
12 there, looking around and stuff.

13 Everybody will stop what they're doing, looking
14 at the police officer, and then they'll leave. They'll do
15 it like a couple times out of the week. It depends because
16 it's always something.

17 Q. So back before May 2022 [sic], knowing all the
18 stuff that you knew that was going on at Raleigh North, did
19 it make you feel safer when you saw Raleigh police officers
20 come into the Raleigh North neighborhood doing a patrol and
21 then leaving?

22 A. No.

23 Q. Why didn't seeing a police officer in a
24 neighborhood where you thought there was a lot of crime,
25 why did that not make you feel safer?